



THE CITY OF NEW YORK
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July 29, 2021

BY ECF

Honorable Ona T. Wang
United States Magistrate Judge
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, NY 10007

Re: Tyrone Massey v. City of New York, et al.,
20 Civ. 8067 (RA) (OTW)

Your Honor:

I am an Assistant Corporation Counsel in the Special Federal Litigation Division of the New York City Law Department, and the attorney assigned to represent defendants the City of New York and New York City Department of Corrections (“DOC”) Captain Holder in the above-referenced matter. Pursuant to the Court’s Order dated July 12, 2021 (ECF No. 35), defendants write herein to respectfully submit the parties’ Proposed Case Management Plan for Pro Se cases, which is annexed to this submission as “Exhibit A.”¹

Defendants thank the Court for its time and attention to this matter.

Respectfully submitted,

Andrew B. Spears /s/
Andrew B. Spears
Assistant Corporation Counsel
Special Federal Litigation Division

¹ The undersigned conferred with plaintiff via telephone regarding the proposed discovery deadlines on July 28, 2021. Nevertheless, please be advised that Items 1 and 2 in the parties’ Proposed Case Management Plan are submitted solely by defendants, and that Item 3(g) could not be jointly proposed, as the parties do not agree on the necessity of expert discovery in this matter.

cc: **VIA U.S. MAIL**
Tyrone Massey
Plaintiff *pro se*
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